

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

**DECLARATION OF ALYSSA DACUNHA IN SUPPORT OF APPLICATION
OF DEBTORS FOR AUTHORITY TO RETAIN AND EMPLOY WILMER CUTLER
PICKERING HALE AND DORR LLP AS SPECIAL COUNSEL
NUNC PRO TUNC TO THE PETITION DATE**

I, Alyssa DaCunha, declare as follows:

1. I am a partner in the firm of Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale” or the “Firm”) and practice out of the Firm’s offices located at 1875 Pennsylvania Avenue, N.W., Washington, D.C. 20006.

2. On November 5, 2019, the Debtors filed their Application of Debtors for Authority to Retain and Employ Wilmer Cutler Pickering Hale and Dorr LLP as Special Counsel *Nunc Pro Tunc* to the Petition Date [Dkt. No. 428] (the “Application”). In support of the Application, my former partner, Reginald Brown, submitted a declaration (the “Original Declaration”) attached to the Application as Exhibit B.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

3. On November 25, 2019, this Court entered the Order Authorizing the Retention and Employment of Wilmer Cutler Pickering Hale and Dorr LLP as Special Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date [Dkt. No. 544].

4. On January 1, 2020, Mr. Brown submitted a supplemental declaration in support of the Application of Debtors for Authority to Retain and Employ Wilmer Cutler Pickering Hale and Dorr LLP as Special Counsel *Nunc Pro Tunc* to the Petition Date [Dkt. 732] (the “First Supplemental Declaration”).

5. Paragraph 3 of the Original Declaration stated: “Beginning in 2017, WilmerHale was engaged to advise Purdue Pharma LP in connection with certain inquiries by Congressional committees into opioid product sales and marketing practices. If retained as special counsel, WilmerHale will continue to provide advice to the Debtors with respect to ongoing or new Congressional inquiries on these topics (the “WilmerHale Services”).

6. Paragraphs 14 and 15 of the Original Declaration and paragraph 3 of the Supplemental Declaration addressed WilmerHale’s representation of potential parties in interest. I hereby supplement those paragraphs as follows:

Pre-petition, Navigators Specialty Insurance Company (“Navigators”) issued insurance policies to Purdue Pharma, L.P. and Rhodes Pharmaceuticals, Inc. Navigators has been named as a defendant in *Purdue Pharma L.P. et al. v. AIG Specialty Insurance Company (f/k/a American International Specialty Lines Insurance Company) et al.*, Adversary Proceeding No. 21-07005 in the Debtors’ bankruptcy cases. As of March 23, 2021, WilmerHale was retained to represent and commenced representing Navigators in that adversary proceeding and in the Debtors’ bankruptcy cases. The subject of that representation is not related to the WilmerHale Services.

7. Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct to the best of my knowledge.

Dated: March 23, 2021
New York, New York

By:

A handwritten signature in black ink, appearing to read "Alyssa H DaCunha", with a long horizontal flourish extending to the right.

WILMER CUTLER PICKERING HALE
AND DORR LLP

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*Special Counsel to the Debtors and Debtors
in Possession*